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22 Attorneys for Defendants LAWRENCE IRA PROZAN
23 DBA PROZAN FINANCIAL SERVICES,
24 MULTI-FINANCIAL SECURITIES CORP.

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26
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28 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

29 REGINA JIMENEZ,

30 Plaintiff,

31 v.

32 NATIONAL ASSOCIATION OF SECURITIES
33 DEALERS, LAWRENCE IRA PROZAN DBA
34 PROZAN FINANCIAL SERVICES, MULTI-
35 FINANCIAL SECURITIES CORP.,

36 Defendants.

CASE NO. 07-03360-MJJ

37 STIPULATION AND [PROPOSED]
38 ORDER REGARDING PLAINTIFF'S
39 AMENDMENT OF COMPLAINT AND
40 DEFENDANTS' RESPONSE TO SAME

1 The parties to this matter, plaintiff Regina Jimenez, defendant National Association of
2 Securities Dealers, Inc. (“NASD”), and defendants Lawrence Ira Prozan DBA Prozan Financial
3 Services and Multi-Financial Securities Corporation (together, “Multi-Financial”) (NASD and Multi-
4 Financial are referred to collectively herein as “Defendants”) by and through their counsel, hereby
5 stipulate as follows:

WHEREAS, Ms. Jimenez filed her "Complaint to Vacate Arbitration Decision" (the "Original Complaint") on June 26, 2007, challenging an interim arbitration decision; and

8 WHEREAS, the Defendants' responses to Ms. Jimenez's Original Complaint are not yet due
9 to be filed with the Court; and

WHEREAS, the panel in the underlying arbitration entered and served a final award in that arbitration on July 24, 2007; and

WHEREAS, Ms. Jimenez desires to amend her Original Complaint in light of the final arbitration award entered and served by the panel on July 24, 2007; and

WHEREAS, the Ms. Jimenez and the Defendants wish to avoid unnecessary expense and inconvenience;

16 THEREFORE, MS. JIMENEZ AND DEFENDANTS STIPULATE AS FOLLOWS:

17 1. the Defendants need not answer or otherwise respond to Ms. Jimenez's Original
18 Complaint, and may instead respond solely to any amended complaint that Ms. Jimenez may file, as
19 they deem appropriate.

20 2. Ms. Jimenez will file and serve her amended complaint in this matter, if any, on or
21 before August 10, 2007.

3. Defendants will answer or otherwise respond to Ms. Jimenez's amended complaint (if
any) on or before September 7, 2007.

24 || SO STIPULATED.

25 DATED: July 30, 2007

LAW OFFICES OF STANLEY G. HILTON

By:

Encl

Attorneys for Plaintiff REGINA JIMENEZ

1 DATED: July ___, 2007

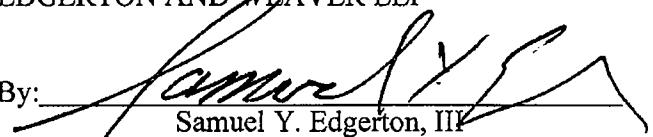
GIBSON, DUNN & CRUTCHER LLP

2 By: _____
3 Ethan D. Dettmer

4 Attorneys for Defendant NATIONAL ASSOCIATION
5 OF SECURITIES DEALERS, INC.

6 DATED: July 30, 2007

7 EDGERTON AND WEAVER LLP

8 By: 
9 Samuel Y. Edgerton, III

10 Attorneys for Defendants LAWRENCE IRA PROZAN
11 DBA PROZAN FINANCIAL SERVICES,
12 MULTI-FINANCIAL SECURITIES CORP.

13 PURSUANT TO STIPULATION, IT IS SO ORDERED.

14 DATED: _____, 2007

15 _____
16 The Honorable Martin J. Jenkins
17 United States District Judge

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1 DATED: July 30, 2007

GIBSON, DUNN & CRUTCHER LLP

2 By: _____ /s/
3 Ethan D. Dettmer

4 Attorneys for Defendant NATIONAL ASSOCIATION
5 OF SECURITIES DEALERS, INC.

6 DATED: July __, 2007

EDGERTON AND WEAVER LLP

7 By: _____
8 Samuel Y. Edgerton, III

9
10 Attorneys for Defendants LAWRENCE IRA PROZAN
11 DBA PROZAN FINANCIAL SERVICES,
12 MULTI-FINANCIAL SECURITIES CORP.

13
14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 DATED: _____, 2007

16 _____
17 The Honorable Martin J. Jenkins
18 United States District Judge

19 100271512_1.DOC